

January 16, 2016

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12 Street, SW  
Washington, DC 20554

Dear Secretary Dortch:

I am writing in response to the FCC's call for comments regarding Third Notice of Proposed Rulemaking (video visitation) due January 19, 2016. I would like to describe my experiences with the Securus video visitation system over the past two years, in the hopes that the FCC will provide some regulation with regard to quality and cost of this service. My son has been incarcerated in several Texas county jails over the past two years, having been transferred among facilities due to overcrowding. The two facilities where video visitation has been offered include Hays and Bastrop Counties. In particular, I would like to speak to both the cost and quality of these services.


The cost for video visitation provided by Securus, which also serves as the phone provider at these facilities, varies significantly between the two. At Hays County, the rate was originally \$5.99 for 25 minutes in 2014 (then increased with no warning to \$7.99 in 2015); at Bastrop County, the rate is \$20 for 15 minutes. Apparently these rates vary with regard to the amount of kickbacks the county jails require. Securus has made hundreds of dollars off my and countless others' misfortune of having a loved one who are incarcerated. In addition to the difficulties I have experienced with the video system, fees upon fees are incurred to add money to my accounts. Each month Securus charges a \$3.99 "wireless administration fee" for phone services. Each time I add money to my son's phone account, Securus charges \$7.99 as an administrative fee. There is an additional \$5.00 convenience fee for using a credit card. And I have been charged an "inactivity fee" of \$2 per month when I do not utilize the video services. When/where does it end?

Unfortunately, the quality of these video visitations do not coincide with the cost of this service, particularly as compared with Skype, which is free and frankly of better quality than the Securus technology. While it is comforting to be able to "see" an incarcerated loved one through video visitation, the system is fraught with problems. Video visitations are frequently and unexpectedly terminated, and refunds can be difficult to obtain. Quality of video is poor as compared to typical video (Skype) services. Additionally, Securus has required that many facilities sign a contract banning in-person visitation where their technology is installed. Fortunately, in Texas where my son is incarcerated, this practice was mostly eliminated (except for some "grandfathered" cases) last spring by the Texas House of Representatives and banned as of October 1, 2015

While those of us who live a far distance from our incarcerated loved ones can appreciate the option of video visitation, the rates and fees must be regulated. Families and friends of incarcerated individuals should not bear the burden of excessive profits for companies such as Securus.

Thank you for your attention to this important matter. Please help family members of the incarcerated keep in touch with their loved ones. Studies show that incarcerated individuals who have outside support have better outcomes when released. Help keep costs reasonable for us as we support our loved ones.

Sincerely,

  
Joanne S. Jones, OTD, OTR/L